



Dedicated to the Practice of Relationships

Richard J. Perr
Direct Dial: 215.893.8724
E-Mail: rperr@finemanlawfirm.com
Admitted in NJ and PA

PHILADELPHIA OFFICE
BNY Mellon Center
1735 Market Street, Suite 600
Philadelphia, PA 19103-7513
Phone: 215.893.9300
Fax: 215.893.8719

NEW JERSEY OFFICE
20 Brace Road, Suite 350
Cherry Hill, NJ 08034
Phone: 856.795.1118
Fax: 856.795.1110

www.finemanlawfirm.com
PLEASE REPLY TO PHILADELPHIA OFFICE

April 17, 2012

The Honorable Michael A. Hammer
Magistrate Judge, U.S. District Court for N.J.
MLK Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street, Room 3053
Newark, NJ 07102

RE: Rodolfo Hernandez, on behalf of himself & those similarly situated
v. Miracle Financial, Inc., and John Does 1 to 25
U.S.D.C., D.N.J., Civil Action No. 2:11-cv-04074-JLL-MAH
Our File No. 5747/00001

Dear Judge Hammer:

The parties to the above action jointly request that the in-person status conference in the above matter scheduled for 11:00 am on Friday, April 20, 2012 be converted into a telephone conference or, alternatively, adjourned for three weeks.

Since the initial case management before Your Honor, Defendant has retained new counsel and the parties have swiftly negotiated a settlement in principle. The only remaining element to be agreed upon by the parties is the matter of attorneys' fees. In the event the parties cannot come to an agreement, Plaintiff would initiate a fee petition proceeding with appropriate opposition papers filed by Defendant. However the parties are hopeful that even this process will be unnecessary. The parties appear to be able to reach this conclusion by the middle of next week.

Accordingly, while the status conference on Friday may be most productive if it was adjourned for three weeks, the parties do not believe that an in-person conference is needed at this time as was contemplated when it was scheduled at the initial case management conference.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Richard J. Perr', written over a horizontal line.

Richard J. Perr

RJP:mfm

cc: Andrew R. Wolf, Esquire